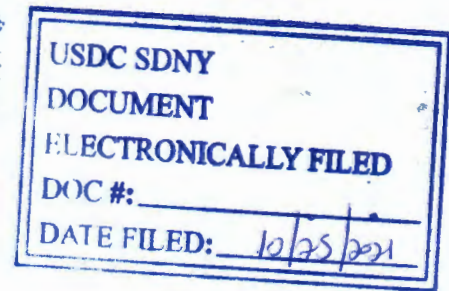




THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

GEORGIA M. PESTANA
Corporation Counsel



MEMO ENDORSED

October 22, 2021

By ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

OK
Colleen McMahon
10/25/2021

Re: *In re: New York City Policing During Summer 2020 Demonstrations*
No. 20 Civ. 8924, *This Filing Relates to All Cases*

Your Honor:

We are Senior Counsels in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, and two of the attorneys who were assigned to the defense in these consolidated matters. In that capacity, we write to respectfully request to withdraw as attorneys of record pursuant to Local Civil Rule 1.4.

The reason for this request is that, since September 20, 2021, the representation of this matter has been handled by Dara Weiss, Jenny Weng, Amy Robinson, and Stephanie Breslow, in addition to other attorneys at the Law Department.¹ Since that date, Ms. Jacobs has been transitioning off of this litigation in order to attend to other matters, including supervising other attorneys and trial supervision. Furthermore, Ms. Goykadosh's involvement in this matter was primarily limited to writing the motion to dismiss; therefore, she has not been involved in the litigation of this matter recently and will have no involvement in the future because for the next few months, she will be consumed with supervising other attorneys' caseloads and handling her own active caseload.²

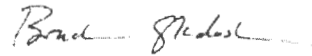
Neither withdrawal will have any impact on the continued defense of this lawsuit. Therefore, we respectfully request to withdraw as counsel of record.

¹ Ms. Breslow will be filing a notice of appearances shortly.

² Local Civil Rule 1.4 states that a request to withdraw will be granted "only upon a showing by affidavit or otherwise of satisfactory reasons for withdrawal or displacement and the posture of the case, including its position, if any, on the calendar, and whether or not the attorney is asserting a retaining or charging lien." As we have explained the reason for withdrawal in this letter, we have not included an affidavit, but can immediately file one if the Court wishes.

Thank you for your consideration herein.

Respectfully submitted,



Brachah Goykadosh
Senior Counsel
Special Federal Litigation Division



Elissa B. Jacobs
Senior Counsel
Special Federal Litigation Division